

EXHIBIT C

1 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

2 ALEXANDRIA DIVISION

3 IN RE: CAPITAL ONE § MDL NO.
CONSUMER DATA SECURITY § 1:19md2915 (AJT/JFA)
4 BREACH LITIGATION, §
§
5 §
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6 VIDEOTAPED DEPOSITION OF  
7 STEPHEN SCHMIDT  
CONDUCTED REMOTELY

8  
9 9:33 a.m. EST  
Friday, the 18th day of September 2020

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13 Blanche J. Dugas, CRR, RPR, CCR No. B-2290  
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1 communications, so that I'll know that you're  
2 trying -- you know, that you're not answering as to  
3 some while answering to others.

4 A. Yes.

5 Q. And what is the answer?

6 A. Could you repeat the question, please?

7 Q. Yeah. Did Amazon ever determine that Ms.  
8 Thompson had gained access or attempted to gain access  
9 to other AWS customer accounts like Ford, Ohio State  
10 University or other customers?

11 A. I don't know.

12 Q. Is it your understanding that -- or were you  
13 told that Paige Thompson had claimed to have done the  
14 same thing to other customers, Ford, Ohio State  
15 University and others?

16 A. Michael Johnson had repeated to me that  
17 Paige claims to have done the same thing to other  
18 customers.

19 Q. And after having been told that by Mr.  
20 Johnson, did you undertake any investigation or have  
21 anyone in your command undertake any investigation to  
22 determine whether or not that had, in fact, occurred?

23 A. Yes.

24 Q. And what was discovered?

25 A. I don't know the results of that. I don't

1 recall.

2 Q. Who did you instruct or communicate to  
3 undertake that investigation?

4 A. It would have been my security operations  
5 team.

6 Q. And who was the team that led that in  
7 July --

8 A. Steven Schuster.

9 Q. Mr. Schuster?

10 A. Correct.

11 Q. And you did identify his -- first name as  
12 Steve?

13 A. Steve. Yes.

14 MR. YANCHUNIS: Give me just a moment.

15 Q. (By Mr. Yanchunis) There on Page 59208 at  
16 1:05 p.m., you see that Mr. Johnson says to you, "Did  
17 we share with you the dossier?"

18 A. Yes, I see that.

19 Q. Okay. Did he share that with you?

20 A. I believe he did.

21 Q. And how many pages was it?

22 A. I don't know.

23 Q. Do you know who created it?

24 A. I don't know.

25 Q. Once it was shared with you, what did you do